

THE JIMMERSON LAW FIRM, P.C.  
JAMES M. JIMMERSON, ESQ.  
Nevada State Bar No. 12599  
[jmj@jimmersonlawfirm.com](mailto:jmj@jimmersonlawfirm.com)  
415 South Sixth Street, Suite 100  
Las Vegas, Nevada 89101  
Telephone: 702-388-7171  
Facsimile: 702-367-1167

KATTEN MUCHIN ROSENMAN LLP  
Jeffrey A. Wakolbinger (*pro hac vice* request forthcoming)  
[jeff.wakolbinger@katten.com](mailto:jeff.wakolbinger@katten.com)  
525 W. Monroe St.  
Chicago, IL 60661  
Telephone: 312.902-5200

*Attorneys for Plaintiff  
Jump Operations, LLC*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

## JUMP OPERATIONS, LLC,

Case No.: 2:22-cv-00575-GMN-DJA

Plaintiff,

V.

RICHARD WRIGHT MERRYMAN,

**PLAINTIFF'S MOTION TO EXTEND  
TIME FOR DEFENDANT TO FILE  
AND SERVE HIS RESPONSE TO  
THE COMPLAINT**

## [FIRST REQUEST]

Plaintiff Jump Operations, LLC (“Plaintiff”), by and through its counsel of record, hereby submits its Motion to Extend Time for Defendant to File and Serve His Response to the Complaint (the “Motion”).

111

111

111

1 This Motion is based upon the pleadings in this action and the following  
2 memorandum of points and authorities.

3 || DATED May 2, 2022.

## THE JIMMERSON LAW FIRM, P.C.

/s/ James M. Jimmerson, Esq.  
JAMES J. JIMMERSON, ESQ.  
Nevada Bar No. 000264  
JAMES M. JIMMERSON, ESQ.  
Nevada Bar. No. 12599  
415 S. Sixth Street, Suite 100  
Las Vegas, Nevada 89101  
(702) 388-7171  
*Attorneys for Plaintiff Jump Operations,  
LLC*

**THE JIMMERSON LAW FIRM, P.C.**  
415 South Sixth Street, Suite 100, Las Vegas, Nevada 89101  
(702) 388-7171 - fax (702) 387-1167

## **MEMORANDUM OF POINTS AND AUTHORITIES**

This action was commenced on April 6, 2022 with the filing of Plaintiff's Complaint. On April 8, 2022, this Court entered a Temporary Restraining Order, prohibiting Defendant from transferring, assigning, or otherwise encumbering the domain [www.wormhole.com](http://www.wormhole.com) (the "Domain") before the hearing on Plaintiff's Motion for Preliminary Injunction. Defendant was served with the Summons, Complaint, Temporary Restraining Order, and Motion for Preliminary Injunction on April 11, 2022. The Court set the hearing on Plaintiff's Motion for Preliminary Injunction for April 20, 2022. During the hearing, the Court granted the motion and prohibited Defendant from transferring, assigning, or otherwise encumbering the Domain during the pendency of this action, except as to allow for the sale of the Domain to Plaintiff.

12 Since the issuance of the Preliminary Injunction, the parties have come to a  
13 resolution and settlement of this action. In an effort to facilitate the completion of the  
14 settlement, Plaintiff respectfully requests that the Court extend Defendant's time to  
15 respond to the Complaint by twenty-one (21) days, to May 23, 2022.

DATED May 2, 2022.

Respectfully submitted,

THE JIMMERSON LAW FIRM, P.C.

/s/ James M. Jimmerson, Esq.  
JAMES M. JIMMERSON, ESQ.  
Nevada Bar. No. 12599  
415 S. Sixth Street, Suite 100  
Las Vegas, Nevada 89101  
(702) 388-7171  
*Attorneys for Plaintiff Jump Operations,  
LLC*

**CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Civ. P. 5, I certify that on May 2, 2022, I caused the document entitled: **PLAINTIFF'S MOTION TO EXTEND TIME FOR DEFENDANT TO FILE AND SERVE HIS RESPONSE TO THE COMPLAINT** to be served by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada to the person(s) listed below at the address, indicated below:

Richard Wright Merryman  
4800 Westmont Ave.  
Pahrump, Nevada 89061

Dated this 2nd day of May, 2022.

/s/ James M. Jimmerson, Esq.  
An employee of the Jimmerson Law Firm, P.C.